

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
FORT WORTH DIVISION**

**UNITED STATES SECURITIES  
AND EXCHANGE COMMISSION,**

**Plaintiff,**

**V.**

**THE HEARTLAND GROUP VENTURES,  
LLC, et al.,**

**Defendants,**

[illegible]

**No. 4:21-cv-1310**

**Hon. Reed O'Connor**

**PLAINTIFF'S STATUS REPORT IN ANTICIPATION  
OF DECEMBER 14, 2021 HEARING**

Plaintiff United States Securities and Exchange Commission hereby submits  
the following status report:

1. This Court has scheduled a preliminary injunction hearing for Tuesday, December 14, 2021 beginning at 9 a.m. (ECF Nos. 12)
2. All defendants in this matter have agreed to preliminary injunctions, obviating the need for the SEC to call witnesses and submit evidence. The SEC will be filing motions for entry of such preliminary injunctions today.
3. There remains one unresolved issue concerning an aspect of defendant Rustin Brunson's preliminary injunction. Specifically, Mr. Brunson seeks to include the following additional provision, which the SEC opposes:

**“III. NO “BAD ACTOR” DISQUALIFICATION**

Pursuant to 17 C.F.R. § 230.506(d)(2)(iii), the Court advises that “Bad Actor” disqualification under 17 C.F.R. § 230.506(d)(1) should not arise as a consequence of this Order.”

4. The parties are prepared to discuss the merits of this provision at the upcoming hearing. As part of their agreed resolution of this preliminary injunction, the SEC and Brunson will both defer and adhere to the Court’s ruling regarding the inclusion of this additional provision.

5. Further, during that hearing the receiver is prepared to update the Court on the status of the receivership.

Dated: December 10, 2021

Respectfully submitted,

**UNITED STATES SECURITIES  
AND EXCHANGE COMMISSION**

By: /s/ Jonathan S. Polish  
Jonathan S. Polish

Jonathan S. Polish (IL Bar No. 6237890)

*pro hac vice pending*

Stephanie L. Reinhart (IL Bar No. 6287179)

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